

RACHEL THOMAS (SBN 244527)
ALE BURKE-VALLEJO (SBN 353890)
GREENFIELD LLP
55 S. Market Street, Suite 1500
San Jose, California 95113
Telephone: (408) 995-5600
Email: rthomas@greenfieldlaw.com
aburke-vallejo@greenfieldlaw.com

JOHN W. HARBIN (*Pro Hac Vice*)
WARREN J. THOMAS (*Pro Hac Vice*)
MEUNIER CARLIN & CURFMAN LLC
999 Peachtree Street NE, Suite 1300
Atlanta, GA 30309
Telephone: (404) 645-7700
Email: jharbin@mcciplaw.com
wthomas@mcciplaw.com

Attorneys for Plaintiff/Counter-Defendant NUMBER 14 B.V.
Specially Appearing for Counter-Defendants RUDY ESCHAUZIER and NICO VAN RIJN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NUMBER 14 B.V.,

Plaintiff,

v.

ANALOG DEVICES, INC.; MAXIM
INTEGRATED PRODUCTS, INC.,

Defendants.

ANALOG DEVICES, INC.; MAXIM
INTEGRATED PRODUCTS, INC.,

Counterclaimants,

v.

NUMBER 14 B.V., RUDY ESCHAUZIER, and
NICO VAN RIJN,

Counter-Defendants.

Case No.: 5:24-cv-02435-EKL

**PLAINTIFF'S RESPONSE TO
DEFENDANTS AND
COUNTERCLAIMANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

1 Plaintiff and Counter-Defendant NUMBER 14 B.V. (“Plaintiff” or “Number 14”) submits
2 this response to “Defendants and Counterclaimants’ Administrative Motion to File Under Seal,”
3 ECF No. 116, filed by Defendants Analog Devices, Inc. (“ADI”) and Maxim Integrated Products,
4 Inc. (“Maxim”) (collectively, “Defendants”) on March 24, 2025.

5 Without prejudice to its ability to later challenge the confidentiality of the underlying
6 information (or the level of confidentiality designation, such as Plaintiff’s forthcoming opposition
7 to Defendants’ Motion to Retain Confidentiality, ECF No. 115, based on the proposed *level* of
8 confidentiality), Plaintiff *does not oppose* Defendants’ request for leave to file under seal (ECF No.
9 116).

10
11
12 Dated: March 27, 2025

By: /s/Warren J. Thomas

Rachel Thomas

Ale Burke-Vallejo

GREENFIELD LLP

John W. Harbin (*pro hac vice*)

Warren J. Thomas (*pro hac vice*)

MEUNIER CARLIN & CURFMAN LLC

17
18 Attorneys for Plaintiff/Counter-Defendant NUMBER 14 B.V.
19 Specially Appearing for Counter-Defendants RUDY
20 ESCHAUZIER, and NICO VAN RIJN
21
22
23
24
25
26
27
28